

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>SHARYL THOMPSON ATTAKISSON, et al.,</b>  <b>Plaintiffs,</b>  v.  <b>ERIC HOLDER, et al.,</b>  <b>Defendants.</b>	<b>Civil Action No. 1:17-cv-364 (LMB/JFA)</b>
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**SECOND AMENDED NOTICE OF DEPOSITION OF VERIZON SECURITY  
ASSISTANCE TEAM PURSUANT TO F.R.C.P. RULE 30(b)(6)**

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of a designated representative or representatives of Verizon Security Assistance Team (“VSAT”) beginning at 9:00 a.m. EST on December 18-19, 2017, at the offices of Motley Rice 401 9th St. NW, Suite 1001 Washington, DC 20004 and Osen LLC 2 University Plaza, Suite 402 Hackensack, NJ 07601, or such other mutually agreeable location, continuing day to day thereafter until completed, upon cross-examination, before a duly authorized court reporter, notary public and video technician.

Verizon Security Assistance Team is defined herein to include its predecessors, successors, subsidiaries, affiliates, employees, officers, directors and owners. As used below, “You” or “Your” refers to Verizon Security Assistance Team, and any of its representatives or authorized agents, employees, officers or directors.

Pursuant to Rule 30(b)(6), you are hereby commanded to produce for deposition one or more persons designated to speak for the agency or organization regarding the following specific topics:

1. The representative designated to speak for the corporation about Verizon's cyber security operations between 2010 and 2014. The inquiry will be limited to the topic of the relationship between Verizon and the U.S. Intelligence Community, including the FBI, CIA, NSA, or any other organization, person, or group of individuals working with or for the U.S. government and/or its intelligence community during the stated time frame, including details of the relationship; the responsibilities of each; the scope of tasks; and any jobs, tasks, or other programs aimed at or involving Plaintiffs' home or business, or any journalist located in the U.S.
2. The representative designated to speak for the corporation about ownership, maintenance, control, and use of the following Verizon Internet Protocol version 4 ("IPv4") and Internet Protocol version 6 ("IPv6") addresses between 2010 and 2014; including, but not limited to, the following cyber-security, hacking, malware, and/or unauthorized access incidents:
  - a. 70.106.238.107
  - b. 70.208.130.191
  - c. 96.241.87.96
  - d. 96.255.234.210
  - e. 108.18.98.113
  - f. 108.18.107.188
  - g. 108.45.139.237
  - h. 173.66.45.212
  - i. 173.73.91.181
  - j. 174.236.97.12
  - k. 174.252.112.169
  - l. 4870:f803:80fa:ffff:4870:f803:80fa:ffff
3. The representative designated to speak for the corporation about ownership, maintenance, control, and use of United States Postal Service ("USPS") IPv4 and IPv6 address blocks assigned to Verizon under various contracts with the USPS between 2010 and 2014; including, but not limited to, the following IP addresses:

- a. 56.91.143.9
- b. 56.189.149.2
- c. 385b:8f09:80fa:ffff:385b:8f09:80fa:ffff
- d. 381b:7b09:80fa:ffff:381b:7b09:80fa:ffff

4. The representative designated to speak for the corporation about Verizon FiOS service and maintenance calls carried out by Verizon, including Verizon authorized personnel, at Plaintiff's residence, 22697 Hillside Circle, Leesburg, Virginia, 20175, between 2010 and 2014, including the purpose of the service or work; when the work or visit occurred; who was involved; who authorized the work; what was done; and all records having anything to do with the work, service call, maintenance, or reporting of the call or service, including any equipment or devices necessary for application at the residence.

5. The representative designated to speak for the corporation about all cybersecurity, hacking, malware, and/or unauthorized access incidents involving the segments of the USPS's wide-area network that were managed by Verizon between 2010 and 2014.

6. The representative designated to speak for the corporation about all cybersecurity, hacking, malware, and/or unauthorized access incidents involving mobile satellite terminals provisioned by Verizon under contracts with the USPS between 2010 and 2014.

7. The representative designated to speak for the corporation about all cybersecurity, hacking, malware, and/or unauthorized access incidents involving the following mobile devices provisioned on Verizon Wireless networks between 2010 and 2014; limited to incidents occurring in Washington, DC, Northern Virginia, and Phoenix, Arizona:

- a. Verizon MiFi 4510L mobile WiFi hotspots; and,
- b. Inmarsat BGAN mobile satellite terminals.

8. Michael A. Mason

9. Peter Trahon

10. Todd Haskell

**SUBPOENA DUCES TECUM**

Each representative is commanded to appear with the following records and information:

1. All records reviewed or considered as part of the process of preparing to speak for the corporation under Rule 30, including investigating or educating the witness to be prepared to speak for the corporation or agency.
2. A current resume or CV. If none is available, the portions of the representative's personnel file that describes his or her background, experience, training, education, and job responsibilities.
3. All records that provide information about topics 1 to 10 above.

Dated this 7<sup>th</sup> day of December, 2017.

Respectfully Submitted,

SHARYL THOMPSON ATTAKISSON  
JAMES HOWARD ATTAKISSON  
SARAH JUDITH STARR ATTAKISSON

By Counsel

/s/ David W. Thomas

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of December, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing (NEF) to the following counsel of record:

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